

Dennis F. Dunne (admitted *pro hac vice*)
Samuel A. Khalil (admitted *pro hac vice*)
MILBANK LLP
55 Hudson Yards
New York, New York 10001-2163
Telephone: (212) 530-5000
Facsimile: (212) 530-5219

and

Gregory A. Bray (SBN 115367)
Thomas R. Kreller (SBN 161922)
MILBANK LLP
2029 Century Park East, 33rd Floor
Los Angeles, CA 90067
Telephone: (424) 386-4000
Facsimile: (213) 629-5063

*Counsel for the Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case.
No. 19-30088 (DM)*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**FIRST SUPPLEMENTAL DECLARATION
OF THOMAS R. KRELLER IN
CONNECTION WITH THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS' RETENTION OF
MILBANK LLP**

Re: Docket No. 1210 & 1766

I, **THOMAS R. KRELLER**, being duly sworn, state the following under the penalty of
perjury:

1 1. I am an attorney admitted to practice in the State of California and a partner in the
2 Financial Restructuring Group of Milbank LLP (“Milbank”), counsel to the Official Committee of
3 Unsecured Creditors (the “Committee”) of PG&E Corporation and Pacific Gas and Electric
4 Company (the “Debtors”). Milbank maintains an office at, among other places, 2029 Century Park
5 East, 33rd Floor, Los Angeles, California, 90067-3019. There are no disciplinary proceedings
6 pending against me.
7

8 2. Unless otherwise stated in this declaration (the “First Supplemental Declaration”),
9 I have personal knowledge of the matters set forth herein and, if called as a witness, I would testify
10 thereto. Certain of the disclosures set forth herein relate to matters not within my personal
11 knowledge, but rather within the personal knowledge of other attorneys and employees of Milbank
12 who have acted at my direction and under my supervision, and are based on information provided
13 by them to me.
14

15 3. On April 3, 2019, I executed and filed my initial declaration (the “Initial
16 Declaration”) [Docket No. 1210] in support of the *Application of the Official Committee of*
17 *Unsecured Creditors Pursuant to 11 U.S.C. §§ 328(a) and 1103(a) and Fed. R. Bank. R. 2014 and*
18 *2016 for Authority to Retain and Employ Milbank LLP as Counsel, Effective as of February 12,*
19 *2019, dated April 3, 2019* (the “Application”)¹ [Docket No. 1208] to, among other things, provide
20 certain disclosures required by the Bankruptcy Code, the Bankruptcy Rules and the Local Rules.
21 This Declaration has been prepared in accordance with the Initial Declaration, which provides that
22 Milbank will supplement the disclosures in the Initial Declaration to the extent required as a result
23 of any new material relevant facts or relationships becoming available during these Chapter 11
24 Cases.
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28 ¹ Capitalized terms used but not otherwise defined herein have the meaning ascribed to them in the Application.

SUPPLEMENTAL DECLARATION

4. Following the filing of the Initial Declaration, Milbank received from the Debtors an expanded list of parties in interest (the “Potential Parties-in-Interest”). Milbank compared this list with the names contained in the database of current and former clients and other relationships maintained by Milbank in the ordinary course of its business. In addition, to the extent a search had not already been performed on such party, Milbank also searched the parties listed in the: (i) *First Supplemental Declaration and Disclosure of Stephen Karotkin Pursuant to 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a) and 2016 on Behalf of Weil, Gotschal & Manges LLP* [Docket No. 1861]; and (ii) *Second Supplemental Declaration and Disclosure of Stephen Karotkin Pursuant to 11 U.S.C. § 327(a) and Fed. R. Bankr. P. 2014(a) and 2016 on Behalf of Weil, Gotschal & Manges LLP* [Docket No. 1950].

5. In addition, Milbank has continued to monitor its new client database to enable prompt disclosure of any information that is contrary or otherwise pertinent to any statements made in the Initial Declaration.

6. Based on these searches and ongoing monitoring, Milbank has identified certain additional Potential Parties-in-Interest that have connections with Milbank. A list of all such connections is attached hereto as **Schedule A**.

7. Milbank also searched whether any of the relationships listed in the Initial Declaration had changed since its filing. To the best of my knowledge, information, and belief, there have been no such changes.

8. Based on all of the foregoing, to the best of my knowledge and except as otherwise noted herein and in the Initial Declaration, Milbank does not represent any entity having an adverse interest in connection with these cases, and therefore continues to be eligible to represent the Committee. Milbank will continue to monitor its connections to the Debtors, their creditors and

1 other parties in interest in these cases. If any additional relationships are discovered or arise which
2 were not disclosed herein or in the Initial Declaration, Milbank will promptly supplement its
3 disclosure to the Court.
4

5 Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true
6 and correct to the best of my knowledge and belief.
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8 Executed on August 5, 2019, Los Angeles, CA
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10 /s/ Thomas R. Kreller

11 Thomas R. Kreller
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SCHEDULE A
Additional Potential Parties-in-Interest

Party Name	Relationship to the Debtors ²	Relationship to Milbank ³
Angelo, Gordon & Co., L.P	2019 Statement Parties (Member of Ad Hoc Committee of Senior Unsecured Noteholders) / Unsecured Noteholder	Current client on a matter unrelated to the Debtors or the Chapter 11 cases.
Centerview Partners LLC	Official Committee of Unsecured Creditors – Professionals and Members	Former client on a matter unrelated to the Debtors or the Chapter 11 cases.
KPMG	Debtors' Professionals	Current client on a matter unrelated to the Debtors or the Chapter 11 cases

² The Relationship to the Debtors is correlated with the categories of relationships from the Debtors' disclosure lists. Where a Party was listed in multiple categories, each category is indicated.

³ A "current client" is an entity for which there are, as of the date hereof, active matters on which Milbank is engaged; a "former client" is an entity for which there were no active matters as of the date hereof, but there may in the future be active matters. Use of the word "potential" before such designations signifies entities for which Milbank was unable to determine whether the similarities of names was a coincidence or whether the party in interest is related to a client in Milbank's databases. Milbank does not represent any "potential" clients in matters related to the Chapter 11 cases. Please note that the identification of a party in interest on Schedule A is not an admission of a conflict, disabling or otherwise.